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Attorneys for Debtors and
Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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| | : |
| In re | : |
| | : |
| MOTORS LIQUIDATION COMPANY, <i>et al.</i>, | : |
| f/k/a General Motors Corp., <i>et al.</i> | : |
| | : |
| Debtors. | : |
| | : |
| | : |
| -----X | |

**SUPPLEMENT TO MOTION OF DEBTORS FOR
ENTRY OF ORDER PURSUANT TO 11 U.S.C. § 105(a) AND GENERAL
ORDER M-390 AUTHORIZING IMPLEMENTATION OF ALTERNATIVE
DISPUTE RESOLUTION PROCEDURES, INCLUDING MANDATORY MEDIATION**

TO THE HONORABLE ROBERT E. GERBER,
UNITED STATES BANKRUPTCY JUDGE:

Motors Liquidation Company (f/k/a General Motors Corporation) and its affiliated debtors, as debtors in possession (collectively, the “**Debtors**”), file this supplement (the “**Supplement**”) to their Motion for Entry of Order Pursuant to 11 U.S.C. § 105(a) and General Order M-390 Authorizing Implementation of Alternative Dispute Resolution Procedures, Including Mandatory Mediation, dated January 11, 2010 [Docket No. 4780] (the “**Motion**”), and respectfully state as follows:

1. As of the date the Motion was filed, the Debtors were in the process of evaluating potential mediators to serve on a panel of mediators at each of the Mediation and Arbitration Locations.¹ In that regard, the Debtors stated in the Motion that “a proposed schedule of mediators would be filed with this Court (with the curriculum vitae of each proposed mediator available from counsel for the Debtors upon request) no later than 10 days prior to the hearing.” (Mot. ¶ 12.)

2. Accordingly, annexed hereto as **Exhibit “A”** and incorporated herein by reference is the proposed schedule of mediators (the “**Schedule**”). The Debtors reserve their rights to supplement, amend, or modify the Schedule.

Notice

3. Notice of this Supplement has been provided to parties in interest in accordance with the Order Pursuant to 11 U.S.C. § 105(a) and Fed. R. Bankr. P. 1015(c) and 9007 Establishing Notice and Case Management Procedures, dated August 3, 2009 [Docket No. 3629]. The Debtors submit that such notice is sufficient and no other or further notice need be provided. No previous request for the relief sought in the Motion has been made by the Debtors to this or any other Court.

¹ Capitalized terms not defined herein have the meanings ascribed to them in the Motion.

Dated: New York, New York
January 29, 2010

/s/ Joseph H. Smolinsky

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Attorneys for Debtors
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Exhibit A

Dallas, Texas

| Name | Experience |
|-------------------------|---|
| Burdin, Mary | Personal injury, products liability |
| Damuth, Brenda J. | Personal injury, products liability |
| Grissom, Jerry | Class actions, personal injury, products liability |
| Hale, Earl F. | Complex business disputes |
| Lopez, Hon. Carlos G. | Personal injury, products liability |
| Martin, Hon. Harlan | Complex business disputes, personal injury, products liability |
| Parker, Walter E. "Rip" | Personal injury, products liability, complex disputes |
| Rubenstein, Kenneth J. | Personal injury, products liability; complex disputes |
| Young, James | Class actions, complex business disputes, insurance disputes, personal injury |

Detroit, Michigan

| Name | Experience |
|----------------------|---|
| Connor, Laurence D. | Complex business disputes |
| Driker, Eugene | Complex business disputes, class actions |
| Harrison, Michael G. | Personal injury |
| Kaufman, Richard C. | Personal injury |
| Muth, Jon R. | Complex business disputes, class actions |
| Pappas, Edward H. | Complex business disputes, products liability |
| von Ende, Carl H. | Complex business disputes |

New York, New York

| Name | Experience |
|------------------------|--|
| Carling, Francis | Products liability, personal injury |
| Cyganowski, Melanie | Complex business disputes |
| Farber, Eugene I. | Products liability |
| Feerick, Kevin | Complex business disputes, products liability |
| Holtzman, Eric H. | Products liability |
| Hyman, Ms. Chris Stern | Insurance disputes |
| Leber, Bernice K. | Complex business disputes |
| Levin, Jack P. | Class actions, breach of warranty claims, products liability |

San Francisco, California

| Name | Experience |
|-------------------------------|--|
| Cowett, Hon. Patricia Ann Yim | Personal injury |
| Donnet, Toni-Diane | Consumer litigation, personal injury |
| Glavis, Greta | Personal injury, complex business disputes |
| Komar, Hon. Jack | Products liability class actions, mass torts |
| McPharlin, Linda Hendrix | Complex business disputes |
| Spieczny, Nancy J. | Personal injury |
| Tucker, William J. | Personal injury, complex business disputes |
| Wied, Colin W. | Complex business disputes, personal injury, products liability |